

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2017-292-WS

IN RE:)	
)	
Application of Carolina Water)	RESPONSE TO MOTION
Service, Incorporated for Approval)	TO QUASH SUBPOENA DUCES
of an Increase in Its Rates for Water)	TECUM
and Sewer Services)	
_____)	

Carolina Water Service, Inc. (“CWS”), hereby responds to the September 5, 2018, Motion to Quash Subpoena Duces Tecum (“Motion”) of the South Carolina Office of Regulatory Staff (“ORS”).

1. In view of the statements of ORS counsel set out in paragraphs 3(a), 3(b), and 3(e) of the Motion identifying orders issued in the referenced U.S. District Court civil action and the pre-filed testimony of witnesses in this case as being the only responsive documents, CWS requires no further response from Mr. Stangler and deems these responses to constitute compliance with the subpoena.
2. In view of the statements of ORS counsel set out in paragraphs 3(f), 3(g), and 3(j) of the Motion stating that Mr. Stangler has no records responsive to the referenced portions of the subpoena duces tecum, CWS requires no further response from Mr. Stangler and deems these responses to constitute compliance with the subpoena.
3. With respect to the claims of attorney client privilege and protection for work product/ trial preparations materials asserted on behalf of Mr. Stangler and/or ORS set out in paragraphs 3(c), 3(d), and 3(h) of the Motion, CWS will accept the

representations of counsel for ORS and will not require production of a privilege log with respect to the documents claimed to be so privileged or protected.

4. With respect to the documents referenced in paragraph 3(j) of the Motion, this was the result of an error on the part of undersigned counsel and should have been qualified to request copies of any such documents **relied upon** by Mr. Stangler in preparing his testimony in this case. The ORS response in this regard is satisfactory and counsel below apologizes for his error.
5. Based on the foregoing, CWS submits that the issues raised by the Motion are resolved.

Respectfully submitted,

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Columbia, South Carolina
 This 5th day of September, 2018